

REMARKS

This Amendment and Response and the following remarks are intended to fully respond to the Non-Final Office Action mailed September 10, 2008. In that Office Action, claims 1-26 were examined, and all were rejected. Specifically, claims 1-10, 13-19, and 24-26 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over U.S. Patent No. 7,313,757 to Bradley et. al. (hereinafter, "Bradley"), in view of U.S. Patent No. 6,589,290 to Maxwell et al. (hereinafter, "Maxwell"). Claims 11, 12, and 20-23 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Bradley in view of Maxwell, and further in view of Bradley, "The XML Companion, Third Edition", published by Addison Wesley Professional, December 12, 2001, downloaded from Safari Books Online, <http://proquest.safaribooksonline.com/021770598>, p.1-18, (hereinafter, "XML Companion"). Reconsideration of these rejections, as they might apply to the original and amended claims in view of these remarks, is respectfully requested.

In this Amendment and Response, claims 1-2, 4-6, 8-16, 18-20, and 22-26 have been amended. No claims have been added, and no claims have been cancelled. Therefore, claims 1-26 remain present for examination.

Interview Summary

The Applicants would like to thank Examiner Rutledge for her time and cooperation in the telephonic interview held on December 22, 2008 with Applicants' Representative, namely, Elizabeth J. Reagan. During the interview, the Applicants' Representative discussed the novelty and non-obviousness of the present disclosure. The Applicants' Representative also discussed how the present disclosure is different from the cited references. No agreement was reached. Again, the Applicants would like to thank Examiner Rutledge for her time and assistance.

Information Disclosure Statement

The Office Action states that the "information disclosure statements filed 02/05/2004 and 04/12/2004 fail to comply with 37 CFR 1.98(a)(2), which requires a legible copy of each cited foreign patent document; each non-patent literature publication . . . The previous examiner listed

the following documents as being cited in the above information disclosure statements but lacking copies in the application file” *Office Action, 09/10/2008, at 2-3*. The Applicants thank the Examiner for bringing this to their attention. The Applicants are researching this and will be providing the apparently omitted copies in the near future to correct this unintentional error. Again, the Applicants thank the Examiner for bringing this to their attention.

Claim Rejections – 35 U.S.C. § 103(a): Claims 1-10, 13-19 and 24-26

Claims 1-10, 13-19 and 24-26 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Bradley in view of Maxwell. The Applicants respectfully disagree and traverse these § 103(a) rejections. To establish a prima facie case of obviousness, the references must teach or suggest each and every one of the claim elements to one of ordinary skill in the art at the time the invention was made. *See* MPEP §§ 2142, 2143.03; *In re Wilson*, 424 F.2d 1382, 1385 (C.C. P.A. 1970). Specifically, the references fail to teach or suggest all of the claim elements.

For example, with respect to claim 1, Bradley in view of Maxwell fail to teach or suggest at least:

...
 creating a structured document using a first version of the solution module;
 inputting the structured document having particular data entry fields associated therewith into a particular version of the solution module, wherein the particular version is different from the first version of the solution module;
 accessing upgrade functionality for:
 determining whether each of the particular data entry fields matches expected data entry fields associated with the particular version of the solution module; and
 modifying the particular data entry fields of the input structured document so that the particular data entry fields match the expected data entry fields to thereby provide a modified structured document that is compatible with the particular version of the solution module, wherein said modifying occurs prior to transforming the modified structured document into a format suitable for visual presentation on a display device.

Claim 1, supra (as amended) (emphasis added).

The Office Action indicates that Bradley teaches a method for upgrading documents. *See Office Action, 09/10/2008, at 4.* However, Bradley relates to creating a form definition template, in which the form definition template is adapted to be deployable on multiple browser platforms. *Bradley, 3:4-17.* Delivering an electronic form in the appropriate language, e.g., HTML, relates only to providing the form in a format that can be rendered by a browser and is thus a fundamentally distinct concept from modifying data entry fields of a document created by a first version of a solution module to provide a document that is “compatible” with a different version of the solution module: “creating a structured document using a first version of the solution module; inputting the structured document . . . into a particular version of the solution module, wherein the particular version is different from the first version of the solution module; . . . *modifying the particular data entry fields* of the input structured document so that the particular data entry fields match the expected data entry fields to thereby provide a modified structured document that is compatible with the particular version of the solution module, wherein said *modifying occurs prior to transforming the modified structured document into a format suitable for visual presentation on a display device.*” *Claim 1, supra (as amended) (emphasis added).*

The Office Action states that Bradley teaches “modifying the particular data entry fields of the input structured document so that the particular data entry fields match the set of expected data entry fields to thereby provide a modified structured document; *because Bradley teaches transforming the form template into a presentation language that matches the target device, and teaches merging data with a form template to render the form in a format that best matches the browser and the end user environment (col. 16, l. 35 – col. 17, l. 30)*” *Office Action, 09/10/2008, at 4-5 (emphasis added).* However, as discussed above, claim 1 recites in part that the “modifying the particular data entry fields . . . to thereby provide a modified structured document that is compatible with the particular version of the solution module” occurs “*prior to transforming the modified structured document into a format suitable for visual presentation on a display device.*” *See claim 1, supra (as amended) (emphasis added).* The Office Action thus fails to point, at a minimum, to where Bradley teaches “modifying the particular data entry fields . . . to thereby provide a modified structured document that is compatible with the particular version of the solution module.” Transforming a form template into a presentation language to render the form in a format for a particular browser is not the same as, for example, “modifying

the particular data entry fields . . . to thereby provide a modified structured document that is compatible with the particular version of the solution module” which occurs “*prior to transforming* the modified structured document into a format suitable for visual presentation on a display device.” *See claim 1, supra (as amended) (emphasis added)*. Indeed, the Office Action’s citation to Bradley at “col. 16, l. 35 – col. 17, l. 30” teaches only how to “[t]ransform the form template into a presentation language (format) that matches the target deviceconverts it to a version of the browser language that best suits the target browser . . . to deliver a form in at least the following formats: HTML . . . DHTML, MSHTML” The Office Action thus does not show where Bradley teaches or suggests at least “modifying the particular data entry fields . . . so that the particular data entry fields match the expected data entry fields . . . ,” much less to where it teaches or suggests providing a “modified structured document that is compatible with the particular version of the solution module” *Claim 1, supra (as amended)*.

Indeed, the Office Action states that Bradley “does not explicitly teach modifying the particular data entry fields of the input structured document so that the particular data entry fields match the set of expected data entry fields to thereby provide a modified structured document” *Office Action, 09/10/2008, at 5*. However, the Office Action states that “Maxwell discloses matching data entry fields to expected data entry fields (col. 27-55), in a form by executing a data population command (col. 10, l. 36-59). Maxwell teaches matching data entry fields to expected data entry fields associated with a particular version of processing functionality, including various interfaces, application programming interfaces (API’s), and browsers (col. 12, l. 2-18).” *Office Action, 09/10/2008, at 5*. However, the Applicants respectfully disagree. Maxwell does not teach or suggest, at a minimum:

...
 creating a structured document using a first version of the solution module;
 inputting the structured document having particular data entry fields associated therewith into a particular version of the solution module, wherein the particular version is different from the first version of the solution module;
 accessing upgrade functionality for:
 determining whether each of the particular data entry fields matches expected data entry fields associated with the particular version of the solution module; and

modifying the particular data entry fields of the input structured document so that the particular data entry fields match the expected data entry fields to thereby *provide a modified structured document that is compatible with the particular version of the solution module*, wherein said modifying occurs prior to transforming the modified structured document into a format suitable for visual presentation on a display device.

Claim 1, supra (as amended).

Rather, Maxwell is related to the basic populating of a form. *Maxwell*, 10:40-60 (“A form may be created using HTML or any other programming language capable of generating a document that provides a place for the user to enter data . . .”). A user attempts to populate a form, and a form completion program determines the target application, such as Internet Explorer, that is displaying the form. *Maxwell*, 11:45-57. The form completion program then searches for a template file resembling the form image displayed to the user. *Maxwell*, 12:19-55. Finding a template file resembling a form image is a fundamentally distinct concept from, for example, “creating a structured document using a first version of the solution module; inputting the structured document . . . into a particular version of the solution module, wherein the particular version is different from the first version of the solution module; . . . *modifying the particular data entry fields of the input structured document so that the particular data entry fields match the expected data entry fields* to thereby provide a modified structured document that is compatible with the particular version of the solution module, wherein said modifying occurs prior to transforming the modified structured document into a format suitable for visual presentation on a display device.” *Claim 1, supra (as amended) (emphasis added).*

Accordingly, for at least the above reasons, Bradley in view of Maxwell fail to disclose each and every element of claim 1. Claim 1 is therefore allowable. Because claims 2-10 and 13-19 depend on allowable base claim 1, these claims are also allowable, and such action is respectfully requested. While the above discussion shows that Bradley in view of Maxwell fail to disclose each and every element of claim 1, amendments are made in the interest only of forwarding the prosecution of this application to allowance and are not necessarily made to address the Office Action’s rejections based on the cited references. Amendments are therefore made without prejudice.

Similarly, for at least the reasons set forth above, Bradley in view of Maxwell fail to

teach or suggest each and every element of claims 24, 25, and 26. For example, Bradley in view of Maxwell fail to teach or suggest at least:

...
an upgrade module configured to *modify an input structured document created by a first version of a solution module* and having particular features associated therewith *so that the modified structured document conforms to expected data entry fields associated with a particular version of the solution module, and wherein the particular version of the solution module is different from the first version of the solution module*; and
a transformation module configured to transform the modified structured document into another document suitable for visual presentation *after the structured document has been modified by the upgrade module*.

Claim 24, supra (as amended) (emphasis added).

...
determine whether a particular version of a solution module has been created that warrants generation of an upgrade module; and
when the determination indicates that generation of the upgrade module is warranted, generate the upgrade module, *wherein the upgrade module is configured to modify an input structured document created by a first version of the solution module and having particular data entry fields associated therewith to create an updated document which conforms to expected data entry fields associated with the particular version of the solution module, wherein said modifying occurs prior to transforming the input structured document into another document suitable for visual presentation*.

Claim 25, supra (as amended) (emphasis added).

...
an upgrade module information structure configured to modify an input structured document created by a first version of a solution module and having particular data entry fields associated therewith so that the modified structured document conforms to expected data entry fields associated with a particular version of the solution module, wherein the particular version of the solution module is different from the first version of the solution module; and

a transformation module information structure configured to transform the modified structured document into a format suitable for visual presentation *after the structured document has been modified by the upgrade module.*

Claim 26, supra (as amended) (emphasis added).

Accordingly, for at least the above reasons, Bradley in view of Maxwell fail to teach or suggest each and every element of claims 24, 25, and 26. Claims 24, 25, and 26 are therefore allowable. While the above discussion shows that Bradley in view of Maxwell fail to disclose or suggest each and every element of claims 24, 26, and 26, amendments to these claims are made in the interest only of forwarding the prosecution of this application to allowance and are not necessarily made to address the Office Action's rejections based on the cited references. Amendments are therefore made without prejudice.

For at least the above reasons, the Applicants respectfully request allowance of claims 1, and 24-26. Dependent claims 2-10 and 13-19 are also allowable for reciting further limitations of allowable base claim 1. Accordingly, the Applicants respectfully request allowance of claims 1-10, 13-19, and 24-26.

Claim Rejections – 35 U.S.C. § 103(a): Claims 11-12 and 20-23

Claims 11-12 and 20-23 were rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Bradley in view of Maxwell and further in view of the XML Companion. The Applicants respectfully disagree and traverse these § 103(a) rejections. To establish a prima facie case of obviousness, the references must teach or suggest each and every one of the claim elements to one of ordinary skill in the art at the time the invention was made. *See* MPEP §§ 2142, 2143.03; *In re Wilson*, 424 F.2d 1382, 1385 (C.C. P.A. 1970). Specifically, the references fail to teach or suggest all of the claim elements.

First, because claims 11-12 depend from allowable base claim 1, *see discussion supra*, claims 11-12 are patentable over Bradley in view of Maxwell and further in view of the XML Companion. As such, any remaining arguments supporting the rejections of claims 11-12 are not acquiesced to even though they are not addressed herein. Further, as discussed *supra*, Bradley in view of Maxwell fail to teach or disclose, among other elements, “creating a structured document using a first version of the solution module; inputting the structured

document . . . into a particular version of the solution module, wherein the particular version is different from the first version of the solution module; . . . modifying the particular data entry fields of the input structured document so that the particular data entry fields match the expected data entry fields to thereby provide a modified structured document that is compatible with the particular version of the solution module, wherein said modifying occurs prior to transforming the modified structured document into a format suitable for visual presentation on a display device.” *Claim 1, supra (as amended) (upon which claims 11-12 depend).*

The XML Companion also fails to teach or suggest the elements of claims 11-12. For example, the XML Companion fails to teach or suggest “. . . determining whether the input structured document lacks data entry fields that were previously classified as optional but are no longer classified as optional in the particular version of the solution module;” *see claim 11, supra*, or “. . . creating new data entry fields in the modified structured document providing that the new data entry fields are lacking in the input structured document and providing that the new data entry fields are required in the particular version of the solution module although considered optional by its schema.” *See claim 12, supra*. The Office Action’s references to the XML Companion’s discussion of “XSLT Transformations,” “DTDs,” and converting documents, *see Office Action, 09/10/2008, at 18-19*, are unrelated to claims 11-12. For example, the XML Companion’s XSL Transformations relate not to data entry fields, for example, but, rather, to transforming an XML document into a particular formatting language: “XSLT is a popular standard for transforming XML documents into other forms, including XML-based formatting languages (such as XSL, XHTML and WML) and other formatting languages . . .” *XML Companion, Chapter 17*. Further, the XML Companion’s DTD discussion, *see, e.g., XML Companion, Chapter 5*, does not teach or suggest, for example, “. . . determining whether the input structured document lacks data entry fields that were previously classified as optional but are no longer classified as optional in the particular version of the solution module . . .” or “. . . creating new data entry fields in the modified structured document providing that the new data entry fields are lacking in the input structured document and providing that the new data entry fields are required in the particular version of the solution module although considered optional by its schema.” *See claims 11 & 12, respectively*. Similarly, the Office Action’s citation to the XML Companion for teaching the “convert[ing] [of] documents from one model to another,”

Office Action, 09/10/2008, at 20-21, does not teach or suggest at least “. . . determining whether the input structured document lacks data entry fields that were previously classified as optional but are no longer classified as optional in the particular version of the solution module;” *see claim 11, supra*, or “. . . creating new data entry fields in the modified structured document providing that the new data entry fields are lacking in the input structured document and providing that the new data entry fields are required in the particular version of the solution module although considered optional by its schema.” *See claim 12, supra*.

Second, with respect to claim 20, Bradley in view of Maxwell and further in view of the XML Companion fail to teach or suggest at least:

. . .
determining whether a particular version of the solution module has been created that warrants generation of the upgrade module;
when the determination indicates that generation of the upgrade module is warranted, generating the upgrade module;
configuring the upgrade module to *modify an input structured document having particular data entry fields associated therewith to create an updated document which conforms to expected data entry fields associated with the particular version of the solution module . . .*

Claim 20, supra (as amended) (emphasis added).

As discussed above, the Office Action points to Bradley, for example, for teaching “wherein the upgrade module is configured to modify an input structured document having particular data entry fields associated therewith to create an updated document which conforms to a set of expected data entry fields associated with the particular version of the procession functionality; *because Bradley teaches transforming the form template into a presentation language that matches the target device, and teaches merging data with a form template to render the form in a format that best matches the browser and end user environment . . .*”

Office Action, 09/10/2008, at 21-22 (emphasis added). Further, as discussed above, the Office Action states that Bradley “does not explicitly teach wherein the upgrade module is configured to modify an input structured document having particular data entry fields associated therewith to create an updated document which conforms to a set of expected data entry fields; however, Maxwell discloses matching data entry fields to expected data entry fields . . .” *Office Action,*

09/10/2008, at 22. However, for at least the reasons set forth above with respect to the discussion of claim 1 and similar rejections with regard to Bradley and Maxwell, these references fail to teach or suggest at least “to modify an input structured document having particular data entry fields associated therewith to create an updated document which conforms to expected data entry fields associated with the particular version of the solution module” *Claim 20, supra (as amended)*. As such, the cited references fail to teach each and every element of claim 20. The Office Action has therefore failed to establish a prima facie case of obviousness.

Further, the XML Companion fails to teach or suggest the elements of claim 20. The Office Action states that “Bradley in view of Maxwell does not explicitly teach wherein said modifying includes creating new data entry fields in the updated document provided that the new data entry fields are required in the particular version of the processing functionality even if the new data entry fields are considered optional by its schema.” *Office Action, 09/10/2008, at 22*. The Office Action states that the XML Companion teaches “XML Document type definitions (DTD) contained both required and optional elements which were indicated by the minimum number of occurrences . . . using XSLT transformations to remove, create, reorder and sort element content, and to replace source elements with new output elements” *Office Action, 09/10/2008, at 22-23*. However, the XML Companion does not teach or suggest the elements of claim 20. For example, the XML Companion fails to teach or suggest configuring an “upgrade module to modify an input structured document having particular data entry fields associated therewith to create an updated document which conforms to expected data entry fields associated with the particular version of the solution module . . . modifying the input structured document to create new data entry fields in the updated document provided that the new data entry fields are required in the particular version of the solution module even if the new data entry fields are considered optional by its schema” *Claim 20, supra (as amended)*. The XML Companion’s XSL Transformations, for example, relate not to data entry fields, for example, but, rather, to transforming an XML document into a particular formatting language: “XSLT is a popular standard for transforming XML documents into other forms, including XML-based formatting languages (such as XSL, XHTML and WML) and other formatting languages” *XML Companion, Chapter 17*. Further, the XML Companion’s DTD discussion, *see, e.g., XML*

Companion, Chapter 5, does not teach or suggest, for example, creating “new data entry fields” required in the “particular version of the solution module” *See claim 20, supra (as amended)*. Similarly, the Office Action’s citation to the XML Companion for teaching the “convert[ing] [of] documents from one model to another,” *Office Action, 09/10/2008, at 23*, does not teach or suggest at least “. . . modifying the input structured document to create new data entry fields in the updated document provided that the new data entry fields are required in the particular version of the solution module even if the new data entry fields are considered optional by its schema” *See claim 20, supra (as amended)*. Thus, Bradley in view of Maxwell and further in view of the XML Companion fail to teach or suggest the elements of claim 20.

Allowance of claim 20 is therefore respectfully requested. Because claims 21-23 depend on allowable base claim 20, these claims are also allowable, and such action is respectfully requested. While the above discussion shows that the cited references fail to disclose each and every element of claim 20, amendments to claim 20 are made in the interest only of forwarding the prosecution of this application to allowance and are not necessarily made to address the Office Action’s rejections based on the cited references. Amendments are therefore made without prejudice. Further, because the cited references fail to teach each and every element of claim 20, as discussed above, any remaining arguments supporting the rejections of claims 20-23 are not acquiesced to even though they are not addressed herein.

For at least the above reasons, the Applicants respectfully request the allowance of claims 11-12 and 20-23.

Conclusion

This Amendment and Response fully responds to the Office Action mailed on September 10, 2008. It is recognized that the Office Action may contain arguments and rejections that are not directly addressed by this Amendment and Response due to the fact that they are rendered moot in light of the preceding arguments in favor of patentability. Hence, the failure, if any, of this Amendment and Response to directly address an argument raised by the Examiner should not be interpreted as reflecting the Applicants’ belief that such argument has merit. Furthermore, the claims of the present application may include other elements, not discussed in this Amendment and Response, which are not shown, taught, or otherwise suggested

by the art of record. Accordingly, the preceding arguments in favor of patentability are advanced without prejudice to other bases of patentability.

It is believed that no further fees are due with this Amendment and Response. However, the Commissioner is hereby authorized to charge any deficiencies or credit any overpayment with respect to this patent application to deposit account number 13-2725.

In light of the above remarks and amendments, it is believed that the application is in condition for allowance, and such action is respectfully requested. Should any additional issues need to be resolved, the Examiner is requested to telephone the undersigned to attempt to resolve those issues.

Respectfully submitted,

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